

Response to Transport Scotland Just Transition Consultation

Submitted by the Motorcycle Action Group (MAG)

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The Motorcycle Action Group (MAG) welcomes the opportunity to respond to the Transport Scotland Just Transition consultation, closing on 19 May 2025. Motorcycling offers an affordable, low-carbon solution to reduce car use, ease congestion, and support Scotland's transport decarbonisation objectives as part of a broader transport mix. Motorcycles contribute just 0.4% of UK transport CO₂ emissions while accounting for 0.9% of vehicle miles in Great Britain, with sub-125cc models producing total life-cycle emissions of 3–5 tonnes CO₂e over 150,000 km, compared to 15–25 tonnes CO₂e for electric cars over 240,000 km ^[1, 2, 3, 4]. By removing barriers to entry through low- or zero-cost incentives for all motorcycles, Scotland can facilitate greater uptake without mandating its use, complementing public transport and active travel. Sub-125cc models offer particular benefits for urban commuting and affordability, while larger motorcycles are ideal for longer distances and leisure riding, supporting diverse transport needs ^[5]. The absence of motorcycles in the draft plan is a missed opportunity, particularly as Scotland revises its transport targets following the abandonment of the 20% car kilometre reduction goal by 2030 ^[6]. This response addresses the consultation's questions, advocating for policies that embrace motorcycling, incentivise modal shift, and ensure technological freedom without electrification mandates, aligning with a fair, inclusive transition and Scotland's National Transport Strategy (NTS) ^[7, 8].

Context and Opportunity

The Just Transition Plan aims to decarbonise transport while prioritising fairness, inclusivity, and community engagement ^[7]. Audit Scotland's findings show car use reduction is off track (only 3.6% below 2019 levels), and the 2030 target's abandonment highlights the need for innovative solutions ^[6, 9]. Motorcycling's efficiency—0.4% of transport CO₂ emissions from 0.9% vehicle miles—stems from low embedded carbon costs, particularly for sub-125cc models, which emit 1–2 tonnes CO₂e during production compared to 6–10 tonnes for electric cars ^[1, 2, 3]. All motorcycles, being lighter than cars, offer congestion and emissions benefits, making them suitable for a weight-based Vehicle Excise Duty (VED) model to incentivise uptake ^[10]. The Transport (Scotland) Act 2019 exempts motorcycles from Low Emission Zones (LEZs) unless local authorities provide specific evidence of significant air pollution contribution, reflecting their low emissions of pollutants like NO_x and particulate matter (PM) ^[11]. Motorcycling supports economic benefits, such as job creation in training and maintenance, and enhances island connectivity by occupying less ferry space than cars, increasing capacity ^[7, 12]. Northern Ireland, a devolved UK nation, has permitted default motorcycle access to all bus lanes since 2004, reducing congestion and rider vulnerability without notable safety impacts for other road users or bus service disruptions, offering a model for Scotland ^[13]. By integrating motorcycling into the NTS's vision of a sustainable, equitable transport system, Scotland can reduce emissions and costs while fostering community and workforce opportunities ^[8].

Specific Responses to Consultation Questions

The consultation poses five key questions for “Everyone,” addressed below, emphasising motorcycling’s role within a diverse transport mix.

Question 4: Are there any gaps in our priority actions to support people and communities in the transition of the transport sector?

Yes, the draft plan overlooks motorcycling’s potential to support Scotland’s transport and equity objectives. Motorcycles contribute only 0.4% of UK transport CO₂ emissions despite 0.9% of vehicle miles, with sub-125cc models producing 3–5 tonnes CO₂e over their lifetime, compared to 15–25 tonnes for electric cars^[1,2,3,4]. Sub-125cc models have particularly low production emissions (1–2 tonnes CO₂e vs. 6–10 tonnes for electric cars), and newer motorcycles emit less NO_x than cars, improving air quality, as recognised by the Transport (Scotland) Act 2019’s exemption of motorcycles from LEZs unless local authorities demonstrate significant pollution contribution^[4,11,14,15]. A 10% modal shift from cars to motorcycles could reduce congestion by 40% and emission costs by 6%^[14]. Integrating motorcycling—through incentives like free parking, bus lane access, or smart ticketing for combined rail/motorcycle journeys for all motorcycles—would enhance urban and rural mobility, complementing public transport and active travel^[7,8]. Northern Ireland’s default bus lane access for all motorcycles since 2004, backed by over 50 km of bus lanes, has reduced congestion and rider vulnerability without notable safety impacts for other road users or bus service disruptions, providing a UK-relevant example^[13]. Case studies, such as the Netherlands’ motorcycle bus lane access, further demonstrate reduced car use and emissions^[16]. This gap is critical, as Audit Scotland notes declining public transport use (bus journeys down 22% from 2012–2022), underscoring the need for low-carbon alternatives^[9].

Question 5: Which of the following priorities would be most helpful for people like you to reduce how often, or how far, they drive in a private car?

Prioritising policies that optimise road space for efficient transport modes, such as allowing all motorcycles access to bus lanes or free parking, is most effective for reducing private car use. Motorcycles, requiring less space than cars, leverage existing infrastructure to ease congestion and emissions, complementing active travel and public transport. Sub-125cc models offer particularly low life-cycle emissions (3–5 tonnes CO₂e vs. 15–25 tonnes for electric cars), while larger motorcycles suit longer journeys^[3,4]. With 307,600 motorcycles registered in Scotland in 2019, there is a substantial user base^[17]. Policies like bus lane access, successfully implemented in London and Northern Ireland, or smart ticketing integrating motorcycle parking at rail stations for all motorcycles, incentivise car trip replacement, leveraging motorcycles’ efficiency (0.4% emissions from 0.9% vehicle miles) and low air pollutant emissions, as affirmed by the Transport (Scotland) Act 2019’s LEZ exemption^[1,2,11,13,18,19]. Northern Ireland’s policy, allowing all motorcycles in bus lanes since 2004, has reduced congestion and improved rider safety without notable safety impacts for other road users or bus service disruptions, aligning with NTS goals^[13]. A 10% modal shift could reduce vehicle hours lost by 40%, supporting sustainable travel post-2030 target revision^[6,9,14,8]. This diversifies low-space, low-carbon options, supporting a balanced transport mix.

Question 6: Does the draft Plan take all groups in society into account in setting out a vision for a future transport system for people and communities?

The plan addresses many groups but overlooks motorcyclists, particularly rural and low-income riders who rely on motorcycles for affordable, flexible transport. Motorcycling enhances labour mobility, accessing jobs in areas with limited public transport, and supports social inclusion through community engagement, such as rider groups^[20]. Sub-125cc motorcycles, with life-cycle emissions of 3–5 tonnes CO₂e, are especially sustainable for cost-conscious riders, while larger motorcycles serve longer-distance and leisure needs^[3,4]. In 2019, Scotland had 307,600 registered motorcycles, a significant community^[17]. Including motorcyclists ensures equity, as per the plan's People and Equity Annex, and supports workforce diversity by creating jobs in training and maintenance^[7,12]. Promoting inclusivity, such as encouraging women or ethnic minorities to ride, could further align with NTS equity goals^[8]. Northern Ireland's bus lane policy demonstrates how motorcycling can be integrated into a devolved nation's transport system, benefiting diverse communities^[13]. This omission is a missed opportunity, given Audit Scotland's noted lack of modal shift progress^[9].

Question 7: Is there anything else you would like to see in the draft Plan for people who are more likely to face challenges accessing affordable, convenient and safe travel options?

Yes, the plan should promote motorcycling, with a focus on sub-125cc models for affordability and accessibility, while extending incentives to all motorcycles to support diverse transport needs. Sub-125cc motorcycles, such as Lexmoto's Titan 125 (£2,000) or used models (£400 with MOT), are significantly cheaper than electric equivalents like Lexmoto's LX08 (£3,200) and electric cars (£20,000+), with lower life-cycle emissions (3–5 tonnes CO₂e vs. 15–25 tonnes)^[21, 22, 3, 4]. A Compulsory Basic Training (CBT) certificate, costing £99–£200 and completed in one day, makes sub-125cc models accessible, unlike full licence training (£600–£1,800) required for larger motorcycles^[21, 23]. Policies like free parking, road resurfacing, and smart ticketing for rail/motorcycle integration for all motorcycles would enhance appeal, while campaigns highlighting motorcycling's environmental benefits (0.4% emissions from 0.9% vehicle miles) and air quality advantages (lower NO_x than cars, as recognised by the Transport (Scotland) Act 2019's LEZ exemption requiring evidence of significant pollution for inclusion) would drive uptake^[1, 2, 11, 14, 15, 24]. Reforming licensing to subsidise CBT and A1 training would enhance safety and accessibility for sub-125cc riders, while broader training subsidies could support all motorcyclists, building on a 48% decline in motorcycle casualties from 2004–2023 and initiatives like Transport Scotland's PRIMEs road marking project^[23, 25, 26]. Northern Ireland's bus lane access for all motorcycles, implemented across over 50 km since 2004, has improved rider safety without notable safety impacts for other road users or bus service disruptions, offering a practical example^[13]. These measures align with NTS accessibility goals and post-2030 target needs, ensuring low-carbon, safe transport^[6, 8].

Question 8: Which of the following principles do you think should be the most important to guide the development of a fair system of payment, to deliver a just transition to net zero in Scotland?

We support costs shared through taxation and incentives, such as reduced costs, to support low-carbon choices. Motorcycles' low emissions—0.4% of transport CO₂ from 0.9% vehicle miles—and lower life-cycle emissions for sub-125cc models (3–5 tonnes CO₂e vs. 15–25 tonnes for electric cars) mean riders contribute minimally to environmental impact, further supported by the Transport (Scotland) Act 2019's LEZ exemption, which requires specific

evidence of pollution for motorcycle inclusion ^[1,2,3,4,11]. A universal weight-based Vehicle Excise Duty (VED) model, benefiting all motorcycles due to their lighter weight compared to cars, alongside training subsidies, would encourage modal shift, while avoiding penalties ensures fairness for low-income riders ^[10]. These align with equitable cost distribution and NTS goals for sustainable transport, supporting economic benefits through jobs in the motorcycle sector ^[7,8,12]. Northern Ireland's bus lane policy for all motorcycles, in place since 2004, shows how low-cost infrastructure changes can promote sustainable transport without notable safety impacts for other road users, a model for Scotland ^[13].

Wider Discussion: Motorcycling as a Sustainable Solution

The absence of motorcycles in the draft plan is a critical oversight, given Scotland's transport challenges. Audit Scotland reports car kilometres at 35.4 billion in 2023, only 3.6% below 2019 levels, far from the 29.3 billion needed by 2030 under the original target ^[9]. With public transport declining—bus numbers down 30%, ScotRail journeys 34% below pre-pandemic levels—motorcycling offers a proven alternative within a diverse transport mix ^[9]. A 10% modal shift could reduce congestion by 40% and emissions by 6%, leveraging Scotland's 307,600 registered motorcycles ^[14,17]. Sub-125cc motorcycles, with life-cycle emissions of 3–5 tonnes CO₂e, outperform electric cars (15–25 tonnes CO₂e) due to lower production emissions (1–2 tonnes vs. 6–10 tonnes) and efficient operation (50–80 MPG), while larger motorcycles support longer journeys and leisure ^[3,4]. Newer motorcycles emit less NO_x than cars, improving urban air quality, as affirmed by the Transport (Scotland) Act 2019's exemption of motorcycles from LEZs unless local authorities provide evidence of significant pollution ^[11,14,15]. Current policies focus on electric vehicles (£80 million for fleet decarbonisation, £16 million for EV chargers) but ignore motorcycles' lower embedded carbon cost and economic contributions, such as tourism (e.g., North Coast 500) and last-mile delivery ^[7,27].

Motorcycling's benefits include:

- **Congestion Relief:** Motorcycles use less road space, easing urban traffic, with a 40% reduction in vehicle hours lost via a 10% modal shift ^[14].
- **Affordability:** Sub-125cc motorcycles (£400–£2,000) are cheaper than electric models (£1,995–£3,200) and electric cars (£20,000+), with larger motorcycles offering cost-effective options for longer trips ^[21,22].
- **Island Connectivity:** Motorcycles occupy less ferry space, increasing capacity for island communities, aligning with NTS accessibility goals ^[8,12].
- **Economic and Social Benefits:** Motorcycling supports jobs in training, maintenance, and tourism, while fostering community engagement through rider groups ^[12,20].
- **Safety Improvements:** Motorcycle casualties fell 48% from 2004–2023, with initiatives like PRIMEs and advanced training enhancing safety ^[25,26].

Case studies demonstrate motorcycling's potential. Northern Ireland's default bus lane access for all motorcycles, implemented in 2004 across over 50 km of bus lanes, has reduced congestion and improved rider safety without notable safety impacts for other road users or bus service disruptions, offering a devolved UK model ^[13]. In Brussels, motorcycle-friendly parking and bus lane policies reduced car trips by 15% in urban areas ^[28]. These examples show how Scotland can integrate motorcycling to enhance sustainability and inclusivity.

Opposition to Electric Mandates

While supporting low-emission innovation, mandating electrification for motorcycles is neither necessary nor equitable. Motorcycles' minimal emissions—0.4% of transport CO₂ from 0.9% vehicle miles—and low life-cycle emissions, especially for sub-125cc models (3–5 tonnes CO₂e), mean their impact is small, further supported by the Transport (Scotland) Act 2019's LEZ exemption^[1,2,3,11]. Electric motorcycles cost more (£1,995–£3,200 vs. £400–£2,000 for conventional models) and face charging challenges, with Scotland's 6,000+ EV chargers primarily car-focused and unevenly distributed in rural areas^[21,22,29]. Electric cars, with 15–25 tonnes CO₂e, require years to offset production emissions, unlike motorcycles' immediate low-carbon advantage^[3,4]. A technology-neutral approach, supporting synthetic fuels or biofuels, ensures affordability and flexibility for all motorcycles, aligning with fairness principles^[7]. Incentives, not mandates, should drive adoption.

Policy Recommendations

To harness motorcycling's potential within a broader transport mix, we propose:

- **Recognise Motorcycling as Sustainable:** Include all motorcycles in the NTS as a low-carbon mode, noting sub-125cc models' efficiency (0.4% CO₂ from 0.9% vehicle miles, 3–5 tonnes CO₂e)^[1,2,3,8].
- **Incentivise Modal Shift:** Implement free parking, bus lane access (following Northern Ireland's model), and smart ticketing for rail/motorcycle integration for all motorcycles to encourage car users to switch, leveraging 40% congestion reduction^[13,14,18,24].
- **Avoid Mandates:** Ensure no electrification mandates, preserving affordability and low embedded carbon costs (£400–£2,000, 3–5 tonnes CO₂e for sub-125cc)^[1,2,3,21,22].
- **Engage Communities:** Co-design policies with motorcyclists, including rural and underrepresented groups, aligning with engagement principles^[30].
- **Promote Awareness:** Launch campaigns highlighting motorcycling's environmental (lower NO_x, 6% emissions reduction), economic, and social benefits, supported by the LEZ exemption^[11,14,15,27].
- **Reform Licensing:** Subsidise CBT and A1 training (£99–£200) for sub-125cc accessibility and extend subsidies to full licence training (£600–£1,800) for all motorcyclists, building on PRIMES' success^[21,23,26].
- **Prioritise Life-Cycle Emissions:** Incorporate total CO₂ emissions in planning, favouring sub-125cc motorcycles for their low emissions^[3,4].
- **Economic Incentives:** Implement a universal weight-based VED model benefiting all motorcycles due to their lighter weight, and fund pilot projects for motorcycle parking at rail stations^[10,18].
- **Support Workforce:** Fund training programmes to create jobs and promote diversity in the motorcycle sector, aligning with just transition goals^[12].

These recommendations address Audit Scotland's call for new strategies, fill the modal shift gap, and support NTS objectives for a sustainable, equitable transport system^[8,9].

Conclusion

Motorcycling is a powerful, underutilised tool for Scotland’s transport transition. With low emissions (0.4% of transport CO2 from 0.9% vehicle miles), affordability (£400–£2,000 for sub-125cc models), low air pollutant emissions (as recognised by the LEZ exemption), and safety improvements (48% casualty reduction), motorcycles reduce car use, ease congestion, and enhance equity, connectivity, and economic benefits ^[1, 2, 11, 21, 22, 25]. Sub-125cc models excel for urban commuting, while larger motorcycles support longer distances and leisure, ensuring broad applicability ^[3, 4]. Northern Ireland’s bus lane policy for all motorcycles, alongside European examples, shows how motorcycling can be integrated into a devolved nation’s transport system, improving rider safety without compromising other road users ^[13]. By incentivising modal shift with policies like weight-based VED, avoiding mandates, reforming licensing, and aligning with the NTS, Transport Scotland can leverage motorcycling’s benefits for a fair, sustainable transition. MAG is committed to collaborating with stakeholders to realise this vision and looks forward to further engagement.

Footnotes

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